

### **REMARKS/ARGUMENTS**

Responsive to the Official Action mailed March 8, 2006, reconsideration is respectfully requested.

In the Action, the Examiner has rejected the pending claims under 35 U.S.C. §103, with reliance upon U.S. Patent No. 5,414,914, to Suzuki et al., in view of U.S. Patent No. 5,240,764, to Haid et al., U.S. Patent No. 5,552,206, to Knoke et al., U.S. Patent No. 5,822,833, to James et al., and further in view of U.S. Patent No. 5,670,234, to Suehr, et al. However, it is respectfully submitted that these references, even when combined, do not teach or suggest the present invention as set forth in the presently pending claims, and accordingly, the Examiner's rejections are respectfully traversed.

It is respectfully noted that the Suzuki et al., Haid et al., Knoke et al., James et al., and Suehr et al. references do not appear to anticipate the present invention, because the present invention requires a process that includes fusible fiber, an imaging step, and a jet-dyeing step. Notably, the process of the present invention is also effected without use of a chemical binder.

Moreover, the combined teachings of the references are not understood to obviate the patentability of the present invention because the references are related to different processes.

The Suzuki et al. reference is unrelated to the present invention because it teaches a process for *aperturing of fabric*. Suzuki does not appear to require a fibrous matrix having fusible fiber, nor does Suzuki et al. appear to contemplate or require a jet dyeing step. As noted, the process of the present invention requires a fibrous matrix having fusible fiber, as well as a jet dyeing step.

The Haid et al. reference uses a hydroentangling process, but does not teach the present imaging process. In addition, the required heat-setting step of Haid occurs *prior to the hydroentanglement step*. The required heat-setting step in Haid et al. is to stabilize the web for transport to a hydroentanglement station. The present invention does not require a heat-setting step prior to the hydroentangling step. Rather, the process of the present invention requires an imaging step, with a heat-setting step only after the imaging step, not before the imaging step.

It is respectfully submitted that the Knoke et al. reference is also unrelated to the present invention. Knoke et al. teaches a process of making a nonwoven/woven composite. This reference requires that the composite be thermal-fixed, and have a smooth surface. Additionally, Knoke et al. requires a coating of melting adhesive on the fabric. The Knoke et al. reference does not appear to require an imaging step and a jet dyeing step, such as required by the process of the present invention. Further, the process of the present invention is free of chemical binder.

The James et al. reference does not teach the required dyeing step of the present invention, nor does this reference require the fusible fiber of the present invention. As noted, the process of the present invention requires a fibrous matrix having fusible fiber, with the present process further requiring a jet dyeing step.

The Suehr et al. reference teaches the use of an acrylic binder, in contrast to the present invention, which specifies formation of a fabric which is free of chemical binder. Additionally, the Suehr et al. reference does not teach or suggest a fibrous matrix having fusible fiber. Again, the process of the present invention requires a fibrous matrix having fusible fiber.

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Applicants' study of the aforementioned references shows that these references appear to relate to different processes, and therefore, it would not be obvious to one skilled in the art combine these teachings. The process of the present invention requires a fibrous matrix having fusible fiber, and further requires an imaging step, and a jet dyeing step. As noted, the process of the present invention is also free from use of a chemical binder. As such, it is respectfully maintained that it would not be obvious to one skilled in the art to combine these various teachings to arrive at the process of the present invention.

In view of the foregoing, reconsideration and formal allowance of claims 1-4, and 6-9 is believed to be in order and is respectfully solicited. Should the Examiner wish to speak with applicants' attorneys, they may be reached at the number indicated below.

The Commissioner is hereby authorized to charge any additional fees which may be required in connection with this submission to Deposit Account No. 23-0785.

Respectfully submitted,

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I hereby certify that this paper is being deposited with the United States Postal Service with sufficient postage at First Class Mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, Virginia 22313-1450 on **August 8, 2006**.

